

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

No. 24-cv-06563-LJL

**NOTICE OF CROSS-MOTION**

**PLEASE TAKE NOTICE** that, upon the Declaration of Defendant, Rudolph W. Giuliani (“Defendant”), the exhibits attached thereto, the Declaration of David Labkowski, Esq., the Statement of Material Facts under Local Rule 56.1, and the accompanying Memorandum of Law, Defendant will move this Court, at a time and place designated by the Court, for an order, pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting summary judgment in favor of Defendant on the “cause of action” alleged in the Complaint in this action.

**PLEASE TAKE FURTHER NOTICE** that papers in opposition to this cross-motion, and reply papers in support of this cross-motion, shall be filed in accordance with a schedule to be agreed by the parties and/or fixed by the Court.

Dated: October 16, 2024  
New York, New York

Respectfully Submitted,

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